

10:00:13 1 A. To be honest with you, I like the lawyer-type
J:00:16 2 books.

10:00:17 3 Q. Do you?

10:00:20 4 A. Grisham, Grisham, and Grisham. Yeah, that's
10:00:20 5 what I like.

10:00:21 6 Q. Those are some of my favorites too.

10:00:23 7 A. I like him.

10:00:24 8 Q. Those are always good.

10:00:25 9 A. And Patterson.

10:00:26 10 Q. Yes. You have good, good choices there. Do
10:00:30 11 you -- do you have any special certifications?

10:00:34 12 A. No.

J:00:39 13 Q. No. Some teacher certifications, education
14 certifications?

10:00:40 15 A. I'm sorry, like in specific areas? Is that
10:00:44 16 what you mean?

10:00:45 17 Q. Well, to be a teacher do you have to have
10:00:48 18 specific certifications?

10:00:49 19 A. You have to be certified in the area that you
10:00:52 20 work in or teach or whatever.

10:00:54 21 Q. And for you that would have been English?

10:00:56 22 A. Right. Right.

10:00:57 23 Q. And did you have that certification?

24 A. Yes.

Q:00:59 25 Q. And do you have it now?

10:01:01 1 A. It was -- when I received it, it was for life.

10:01:06 2 Q. Right.

10:01:07 3 A. So --

10:01:07 4 Q. Lifetime?

10:01:07 5 A. -- I take for granted that I do have it.

10:01:11 6 Q. Okay.

10:01:11 7 A. Yes. I assume it, but I don't know.

10:01:14 8 Q. Okay. And are you bilingual?

10:01:26 9 A. No.

10:01:28 10 Q. Let's see. What about sources of income that

10:01:28 11 you have right now?

10:01:29 12 A. Teacher retirement and I work at an -- at an

10:01:36 13 office. It's a healthcare center.

10:01:39 14 Q. Okay.

10:01:39 15 A. That's where I work.

10:01:45 16 Q. And what healthcare center is that?

10:01:47 17 A. Everlasting Home Healthcare.

10:01:56 18 Q. And what do you do for them?

10:01:58 19 A. Office -- office work.

10:01:59 20 Q. So what's a typical -- typical day like?

10:02:04 21 A. More -- more filing and keeping the charts up

10:02:12 22 to date and thinning charts and answering the telephone

10:02:16 23 and just office work.

10:02:18 24 Q. So this healthcare center is -- does -- is it

10:02:22 25 for home care, for -

10:02:23 1 A. It's for home care.

10:02:24 2 Q. For people that are maybe homebound or sick or

10:02:29 3 disabled?

10:02:29 4 A. It's for Medicare and Medicaid clients and

10:02:35 5 private pay clients, people of that nature, mostly

10:02:41 6 senior citizens, older people.

10:02:43 7 Q. And how many people work there?

10:02:45 8 A. In the office, you mean? I think about six

10:02:53 9 office workers.

10:02:55 10 Q. And how long have you been working there?

10:02:59 11 A. About a year.

10:03:06 12 Q. And how did you come to hear about that job?

10:03:09 13 A. Actually, a friend of mine, a church member,

10:03:11 14 owns that business and she offered me a job there.

10:03:18 15 Q. And who is this individual?

10:03:20 16 A. Ruby Robinson.

10:03:26 17 Q. And how much do you make per hour?

10:03:29 18 A. \$12.00.

10:03:31 19 Q. And how many hours do you work a week?

10:03:34 20 A. It -- it varies because ever so often I will

10:03:38 21 get in 40 hours, but I don't always get the amount of

10:03:43 22 time. So between 30 and 35 hours a week.

10:03:49 23 Q. So almost full time?

10:03:50 24 A. Almost, yes.

10:03:51 25 Q. Do you have some flexibility, meaning you can

10:03:53 1 kind of come and go as you please or do you have a time
10:03:56 2 clock that you have to punch?

10:03:58 3 A. I don't have to punch a time clock. The
10:04:01 4 agreement is because I have to take care of my sister,
10:04:03 5 then I can only get in what I can.

10:04:05 6 Q. Right.

10:04:05 7 A. So that's -- that's what it's based on.

10:04:07 8 Q. Well, tell me a little bit about what taking
10:04:10 9 care of your sister entails?

10:04:13 10 A. She's paralyzed on her left side. That kind of
10:04:18 11 sums it up.

10:04:21 12 Q. Okay. And so when you say you are obligated to
10:04:26 13 take care of her -- and I know obviously she's your
10:04:28 14 sister and you love her -- taking care of her entails,
10:04:34 15 what, actually feeding her, dressing her?

10:04:36 16 A. She can feed herself. I have to help her with
10:04:40 17 dressing. She can do a few things, but I have to bathe
10:04:43 18 her, dress her, etcetera, etcetera.

10:04:45 19 Q. Okay. And so she -- she, you said, suffered a
10:04:49 20 stroke?

21 A. Yes.

10:04:49 22 Q. Okay. And do you know if that runs in your
10:04:54 23 family?

24 A. Yes.

10:04:55 25 Q. It does? Okay. Do you have benefits at the

10:05:03 1 home healthcare place of business where you work?

10:05:09 2 A. Medical insurance.

10:05:10 3 Q. You do have medical?

10:05:11 4 A. Medical.

10:05:16 5 Q. And what does that entail? Just medical? Do

10:05:18 6 you have vision?

10:05:19 7 A. To be honest with you, I -- I don't know, but

10:05:23 8 there was some options -- some choices that we could

10:05:27 9 make and right now I don't recall which ones I chose.

10:05:33 10 Ms. Robinson was going to pay so much and we would have

10:05:36 11 to pay the rest. But it did -- I think it offered

10:05:41 12 vision and dental and medical and some other things

10:05:46 13 that I cannot even recall right now.

10:05:48 14 Q. Pretty comprehensive, though?

10:05:50 15 A. I think, but I'm not certain because I haven't

10:05:55 16 reviewed it.

10:05:56 17 Q. Okay. Do you use the insurance very much, the

10:05:59 18 medical or the health insurance?

10:06:00 19 A. No.

10:06:04 20 Q. Okay. So you don't -- you're not too -- sounds

10:06:06 21 like you're not too concerned about it maybe because

10:06:08 22 you don't -- you don't go to the doctor very much, you

10:06:09 23 don't --

10:06:09 24 A. Right.

10:06:09 25 Q. -- you don't get sick very much?

10:06:10 1 A. Right.

10:06:11 2 Q. Fair to say?

10:06:12 3 A. Right.

10:06:16 4 Q. Okay. Kind of going back over sources of

10:06:18 5 income and things like that, just to -- to make a

10:06:22 6 determination. Do you have any trust funds or anything

10:06:25 7 that help you?

10:06:25 8 A. I don't have anything now. I had an annuity

10:06:29 9 and I had to withdraw it when I first came off because

10:06:34 10 of making a house payment, car payment, other bills

10:06:39 11 that I tried to take care of and it was soon gone.

10:06:45 12 Q. Okay. And when you -- when you say when you

10:06:47 13 came off, you mean from -- from Judson, your employment

10:06:50 14 at Judson?

10:06:50 15 A. Exactly.

10:06:56 16 Q. Okay. So this annuity lasted for a little

10:06:59 17 while, but that was about it. You didn't have any

10:07:00 18 other investments?

10:07:01 19 A. No.

10:07:02 20 Q. Or no gifts or loans?

10:07:05 21 A. No.

10:07:05 22 Q. Do you know own any property?

10:07:07 23 A. Just my house that I'm in.

10:07:12 24 Q. Okay. And how long have you lived there?

10:07:14 25 A. About seven years, I think.

10:07:25 1 Q. And I think you've kind of answered some of
10:07:27 2 these questions. You're not currently under a doctor's
10:07:30 3 care for any reason?

10:07:35 4 A. No.

10:07:37 5 Q. So you're not being treated for -- for
6 anything?

10:07:38 7 A. No.

10:07:39 8 Q. Not for depression?

10:07:40 9 A. No.

10:07:41 10 Q. Or inability to sleep?

10:07:42 11 A. No.

10:07:43 12 Q. Not for high blood pressure?

10:07:44 13 A. No.

10:07:45 14 Q. Okay. And you're not taking any medication for
10:07:48 15 any of those things?

10:07:49 16 A. No.

10:07:50 17 Q. Correct?

10:07:51 18 A. Right. That's right.

10:07:53 19 Q. Would you say that you -- you're in good
10:07:55 20 condition healthwise?

10:07:56 21 A. Yes.

10:08:01 22 Q. Physically you feel good?

10:08:03 23 A. Yes.

10:08:03 24 Q. Emotionally you feel good?

10:08:05 25 A. Yes.

10:08:06 1 Q. Okay. Mentally you feel good?

10:08:14 2 A. Yes.

10:08:17 3 Q. Have you ever been diagnosed as having any kind

10:08:19 4 of mental illness or mental disorder?

10:08:19 5 A. No.

10:08:22 6 Q. Has anybody in your family ever been diagnosed

10:08:25 7 with a mental illness or mental disorder?

10:08:29 8 A. No. Just I had -- my uncle's wife many years

10:08:32 9 ago when I was younger, she was diagnosed with that,

10:08:34 10 but not immediate family.

10:08:37 11 Q. Okay. So she was diagnosed with a mental

10:08:37 12 illness?

10:08:37 13 A. Yes.

10:08:42 14 Q. Okay. So you would say that you're able to

10:08:46 15 enjoy life for the most part to the best of your

10:08:46 16 ability?

10:08:47 17 A. Yes.

10:08:51 18 Q. To socialize when you get the chance, go out

10:08:53 19 with friends if you get the opportunity either at

10:08:57 20 church or --

10:08:58 21 A. Well --

10:08:58 22 Q. Or do you spend most of your time with --

10:09:01 23 A. I don't have a whole lot of time for that now,

10:09:03 24 to be honest.

10:09:04 25 Q. Well, when you get the chance, do you get to